

WILLIAM J. PENNINGTON, III

ATTORNEY AT LAW

4 CREEKSID DRIVE

PAWLEYS ISLAND, SOUTH CAROLINA 29585

ADMITTED IN NORTH CAROLINA
TELEPHONE (803) 237-2591
FAX (803) 237-2591

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AUDIO SERVICES
DIVISION
PRACTICE LIMITED TO MATTERS BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

May 3, 1993

MAILING ADDRESS:
P.O. Box 2506
PAWLEYS ISLAND, SC 29585

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Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

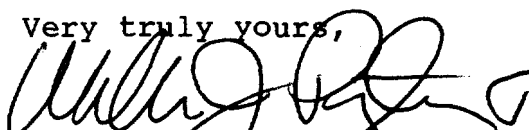
RE: Change of Community of License, WPAL-FM Walterboro, SC

Dear Ms. Searcy:

Transmitted herewith, on behalf of Gresham Communications, Inc., is an original and four (4) copies of a Petition for Rule Making seeking the reallocation of Channel 265C3 from Walterboro, South Carolina to Ridgeville, South Carolina and the modification of the license for WPAL-FM specifying the change in community of license.

Should there be any questions regarding this matter, please do not hesitate to contact the undersigned.

Very truly yours,


William J. Pennington, III
COUNSEL FOR GRESHAM COMMUNICATIONS, INC.

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Enc.
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

May 13 2 33 PM '93
AUDIO SERVICES
DIVISION

In the Matter of)
)
Amendment of Section 73.202(b))
Table of FM Allotments)
(Walterboro and Ridgeville,)
South Carolina))

To: Chief, Policy and Rules Division

MM Docket #
RM-

RM-8246
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PETITION FOR RULE MAKING

Gresham Communications, Inc. ("Gresham"), licensee of FM Broadcast Station WPAL-FM at Walterboro, South Carolina, respectfully requests that the Commission amend Rule 73.202(b), the FM Table of Allotments to reassign Channel 265C3 to Ridgeville, South Carolina as that community's first local broadcast service and modify the license for WPAL-FM to specify operation on Channel 265C3 from the new community of license.

In support of this allocation request, the following information is respectfully submitted:

1. As is demonstrated in attached Exhibit 1, Channel 265C3 meets all applicable spacing requirements for reassignment from Walterboro to Ridgeville, South Carolina. The geographic coordinates outlined on Exhibit 1, North Latitude 33-06-00 West Longitude 80-20-30, allow proper spacing with second adjacent channel station WSUY(FM) on Channel 263C3 at Charleston, South

Carolina. This site is 3 kilometers northwest of Ridgeville. From this antenna site, a station operating on Channel 265C3 would have no difficulty placing a 70 dBu service contour over the entire community of Ridgeville. Complete line of sight coverage would be provided the community.

2. The reallocation of Channel 265C3 from Walterboro to Ridgeville meets all of the Commission's criteria set forth in Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7097 68 2d 644, 650 (1990) and is in the public interest.

3. The reassignment of Channel 265C3 to Ridgeville would create a first local service in that community. Ridgeville, with a 1990 United States Census population of 1,625 persons, is an incorporated community located in Dorchester County. The 1990 United States Census credited Dorchester County with a population of 83,060 persons. Ridgeville has all of the requisite indicia needed for an FM channel allotment. The town is governed by a town council, has police and fire departments, a post office, businesses, churches, and school. Ridgeville is not located in any urbanized area. The majority of the area surrounding Ridgeville is used for agricultural and timber related activities.

4. The relocation of Channel 265C3 to Ridgeville furthers the Commission's mandate in Section 307(b) of the Communications Act of 1934, as amended, to equitably distribute frequencies in a

fair and efficient manner. The Commission has determined that the provision of first local service is an important policy objective. See Second Report and Order in MM Docket No. 80-130, 90 FCC 2d 88, 51 RR 2d 807 (1982).

5. If Channel 265C3 is reassigned to Ridgeville, Walterboro would continue to receive local broadcast service from AM Broadcast Station WALD (1080 kHz. 2.5 KW-Day) and FM Broadcast Station WONO (93.7 MHz. 6.0 KW).

6. WPAL-FM is currently authorized to operate with a directional antenna from an antenna site east southeast of Walterboro. From this antenna site, WPAL-FM can not provide Ridgeville with 70 dBu service. The reallocation of Channel 265C3 to Ridgeville would allow WPAL-FM to serve a greater number of persons while operating non-directionally.

7. Upon the Commission's grant of this request, the petitioner will immediately file an application seeking the necessary facility changes. When issued a construction permit, the petitioner will promptly begin construction of the facility changes needed to change communities of license.

Based on the foregoing, Gresham Communications, Inc. hereby respectfully requests that the Commission amend its FM Table of Allotments to reassign Channel 265C3 from Walterboro, South Carolina to Ridgeville, South Carolina and modify the license of WPAL-FM accordingly to outline operation on that channel from the new community of license.

Respectfully submitted,

GRESHAM COMMUNICATIONS, INC.

By: 

William J. Pennington, III
Its Attorney

Post Office Box 2506
Pawleys Island, SC 29585
(803) 237-2591

May 3, 1993

EXHIBIT 1

FM CHANNEL STUDY

REFERENCE STATION: PROPOSED
RIDGEVILLE SC

LAT/LONG: 33-06-00 N, 80-20-30 W
CHANNEL/CLASS: 265C3

STATION CITY OF LIC	CH #/CL	LATITUDE/ LONGITUDE	DIST (KM) REQ (KM)	DIST (MI) +/- (KM)	BEARING
WORG-do ELLOREE SC	262A	33-30-07 80-32-14	48.179 42	29.937 6.179	337.86 CLEAR
WORG-cp ELLOREE SC	262C3	33-21-42 80-41-05	43.172 43	26.826 0.172	312.32 CLOSE
WSUY-cp CHARLESTON SC	263C3	32-49-20 79-58-45	45.791 43	28.453 2.791	132.36 CLOSE
WGTV-ord ANDREWS SC	264A	33-24-24 79-27-07	89.546 89	55.642 0.546	67.63 CLOSE
WSUY-do CHARLESTON SC	264A	32-49-20 79-58-45	45.791 89	28.453 -43.209	132.36 SHORT /1
WGTV-do ANDREWS SC	265A	33-24-24 79-27-07	89.546 142	55.642 -52.454	67.63 SHORT /2
WSTS-cp FAIRMONT NC	265C2	34-16-17 78-56-24	183.741 177	114.171 6.741	44.76 CLEAR
WNTC-do WALTERBORO SC	265A	32-52-52 80-41-24	40.595 142	25.225 -101.405	233.21 SHORT
WNTC-ord WALTERBORO SC	265C3	32-51-46 80-29-44	29.994 153	18.637 -123.006	208.59 SHORT
WYFA WAYNESBORO GA	265A	33-10-42 81-59-24	153.891 142	95.624 11.891	273.24 CLEAR
PRM-x1(a) COLUMBIA SC	267C	34-03-04 80-40-55	110.181 96	68.463 14.181	343.44 CLEAR
WWDN-dp(x1) SUMTER SC	267C	34-03-04 80-40-55	110.181 96	68.463 14.181	343.44 CLEAR

/1 WSUY(FM) HAS JUST RECENTLY BEGUN OPERATION ON CHANNEL 263C3

/2 WGTV-FM HAS BEEN ORDERED TO CHANNEL 264A